

1 Manager I take it refers to yourself?

2 A I assume so, yes.

3 Q And on or about April 5, 2001 you had completely
4 reviewed KALW's Public Inspection File?

5 A Yes.

6 Q And to the extent you could, you made sure that it
7 contained all required documents, reports and information?

8 A Yes.

9 Q Moving down to the next to the last sentence of
10 that response, 'The Operations Manager has been assigned
11 responsibility for maintaining and keeping the Public
12 Inspection Files up to date.' The Operations Manager
13 referenced there is you?

14 A Yes, it is.

15 Q And as of April of 2001 you had been assigned
16 responsibility for maintaining and keeping the Public
17 Inspection File up to date?

18 A Yes.

19 Q And you have done so?

20 A Yes, I have.

21 MR. SHOOK: Moving on to response number five, we
22 can go off for just a second.

23 (Off the record at 2:29 p.m.)

24 (On the record at 2:30 p.m.)

25 MR. SHOOK: Back on the record.

1 BY MR. SHOOK:

2 Q Mr. Helgeson, with respect to he response that was
3 given to inquiry/directive number five, were you the person
4 that provided that information?

5 A That information was, I would say, agreed to by
6 myself and the Station Manager.

7 Q So, this was something that you and Ms. Sawaya
8 discussed and determined what the answer should be?

9 A From our review of the Public File, yes, it was
10 correct.

11 Q I want to move forward in time to September of
12 2004, so we're almost up to date here. That's right, it
13 means we're getting close.

14 A Oh.

15 MR. SHOOK: Marissa, do you have a copy of the
16 Admissions Response?

17 MS. REPP: Yes.

18 MR. SHOOK: Okay.

19 (Off the record at 2:29 p.m.)

20 (On the record at 2:30 p.m.)

21 MR. SHOOK: Back on the record.

22 BY MR. SHOOK:

23 Q All right. In terms of Admissions Request No. 12
24 and SFUSD's response, what I want to focus on is the very
25 last sentence of that response, which reads, 'The three

1 pages that SFUSD believes constitutes the SFUSD 1993
2 Supplemental Ownership Report are reproduced in Attachment 2
3 hereto.' And counsel for SFUSD just went over with you what
4 those three pages were.

5 A These three pages, yeah.

6 Q And you will note that the second page has a date
7 that reflects when that document was signed by whoever
8 signed it. And that date is December 10, 1997, is it not?

9 A That's what it says, yes.

10 Q Which would certainly suggest that that particular
11 document was created on or about that date?

12 A Yes.

13 Q And were the three pages that constitute
14 Attachment 2 to the Admissions Response gathered by
15 yourself?

16 A Were what gathered by myself again?

17 Q Did you gather the three pages that we're now
18 looking at as Attachment 2 to the Admissions Response?

19 A No.

20 Q Do you know who did?

21 A I don't know. I did not.

22 Q You did not and you don't know?

23 A No.

24 Q Fair enough. Given that the date that appears in
25 the writing is December 10, 1997, what knowledge, if any, do

1 you have as to whether or not there was a 1993 Supplemental
2 Ownership Report reported prior to that time?

3 A I could only assume that there was one created,
4 and an original of that sent to the FCC and a photocopy
5 before it was sent the FCC was put in the Public File,
6 that's what I would assume.

7 Q That's what you would assume but, so far as any of
8 us know, no such document has been produced yet, has it?

9 A Correct.

10 MR. SHOOK: Now, I'd like to go through the same
11 exercise with respect to Response 15 and it's answer. Of
12 the record.

13 ~~(Off the record at 2:39 p.m.)~~

14 (On the record at 2:42 p.m.)

15 MR. SHOOK: Back on.

16 BY MR. SHOOK:

17 Q Now, counsel for SFUSD has just read to you a
18 response, excuse me, Admission Request No. 15 and then
19 SFUSD's response, and the portion of that response that I
20 would like you to focus on is the very last sentence which
21 reads, 'The three pages that SFUSD believes constitutes the
22 SFUSD 1995 Supplemental Ownership Report are set forth in
23 Attachment 4 hereto.' Did you gather the pages that
24 constitute Attachment 4?

25 A Did I gather them for which document?

1 Q For the Admissions Response that SFUSD made within
2 the last month to the Commission?

3 A I did not gather these.

4 Q Do you know who did?

5 A I do not.

6 Q Now, I take it that you noticed that both the 1993
7 Supplemental Report as provided to the Commission within the
8 last month, as well as the 1995 Supplemental Report both
9 reflect that the documents in question were prepared in
10 December of 1997. Do you have any knowledge as to how it is
11 that two such reports came to be prepared in 1997?

12 A It looks like from the date of the signatures they
13 ~~were prepared in December of 1997. And no, I don't know.~~

14 Q You personally did not type up either of these
15 reports?

16 A I don't recall typing them up, no.

17 Q Do you recall being directed to type or prepare
18 any such reports in December of 1997?

19 A I don't recall that.

20 Q Going back to December of 1997 and trying to
21 picture who's in the office at the time, we have Jeff
22 Ramirez is the General Manager or Station Manager?

23 A Right, right.

24 Q You're the, well, I guess the next person in the
25 pecking order as the Operations Program Manager?

1 A Yes.

2 Q If you didn't prepare these reports, who is the
3 most likely person to have prepared such a report?

4 A They would have been prepared at the behest of
5 Jeff Ramirez, I would say. And it could have been a
6 volunteer, it could have been Teresa Nguyen, who I
7 mentioned, who was an administrative person in the front
8 office at that time.

9 Q Do you know where she might be at this point?

10 A I don't. She stopped working at KALW and took a
11 job outside of radio and I've lost contact with her.

12 Q What was the last contact that you had with her,
13 roughly?

14 A Several years ago.

15 Q Do you have any reason to know whether she's still
16 in the San Francisco Area?

17 A I'm not certain of her location, I don't know.

18 Q And at that time she was a volunteer?

19 A No, she was an employee.

20 Q Oh, she was an employee, okay.

21 A She was our admin front office, front office
22 administration person. I recall she was working on a
23 graduate degree and so she was working part time.

24 MR. SHOOK: Okay. I may be pretty close to the
25 end, so we can go off the record, I'll confer.

1 (Off the record at 2:46 p.m.)

2 (ON the record at 2:48 p.m.)

3 MR. SHOOK: Back on the record. Okay, I think I'm
4 pretty close to the end.

5 BY MR. SHOOK:

6 Q During the period, I want to focus on the period
7 when you were acting Station Manager the second time around,
8 so this was after Michael Johnson left and about the time
9 that Nicole Sawaya came on as Station Manager. We've
10 already talked about, at length, the letter that came from
11 the Commission, and the directives that were in that letter,
12 there were the five directives, and that you in turn had
13 some role in preparing the responses to those directives.
14 My question at this point is, as acting Station Manager,
15 when the directives from the FCC came to your attention, did
16 you bring that information to the attention of anyone on the
17 School Board?

18 A No, I did not. Just as a procedural, I don't
19 report to the School Board.

20 Q Who would you have reported to?

21 A I would report to my manager at the School
22 District, whoever was overseeing the radio station in the
23 organizational chart.

24 Q And at that point -- sure -- and at that point in
25 time who was that?

1 A Jack, I'm not sure of the exact -- up until --
2 Jackie Wright was the new Director of Public Engagement and
3 Information in early 2001, I want to say approximately in
4 January. Before that it was a gentleman named Acur, and I
5 cannot pronounce his last name very well, so I'm not going
6 to even try --

7 Q That's okay.

8 A -- who was the School District Administrator.

9 Q But given that this letter from the Commission was
10 dated in February 2001, it would have been when the first
11 person --

12 A Jackie Wright, yeah.

13 Q -- Jackie Wright was there. Did you bring to
14 Jackie Wright's attention the directives that had come from
15 the FCC by that February 2001 letter?

16 A I don't recall.

17 Q Did you bring to Jackie Wright's attention the
18 responses that KALW/SFUSD was supplying to the Commission?

19 A I did not.

20 Q Do you know if anyone did?

21 A I believe at that point, during the time of the
22 response preparation, Nicole Sawaya became General Manager
23 of the station and she would have overseen that.

24 Q So, at that point, once Nicole became General
25 Manager, if any communications had been made with Jackie

1 Wright, they would have been made by Nicole and not by you?

2 A Correct.

3 Q But prior to the time Nicole came on board, you
4 have no recollection, one way or the other, as to whether or
5 not you brought to Jackie Wright's attention the FCC
6 directives and any responses that SFUSD was going to give to
7 the Commission?

8 A At that point I did not, no. I did have reason to
9 believe that they knew but I did not.

10 Q When you say you have reason to believe they knew,
11 do you mean that Jackie Wright would have known through some
12 independent means that the Commission was making these
13 inquiry/directives?

14 A I believe that --

15 MS. REPP: Do you have a concern about
16 attorney/client privilege?

17 THE WITNESS: It's -- I would have assumed --
18 well, yes, in the sense of I don't believe that I'm the only
19 person our attorney spoke with regarding KALW.

20 MR. SHOOK: Very good. I have nothing further.

21 MS. REPP: Bill, if I could take a few moments to
22 do a few follow-up questions.

23 MR. SHOOK: Okay. As a deponent you never escape.

24 BY MS. REPP:

25 Q In terms of the people who formed Golden Gate

1 Public Radio, do you recall the names of some of the
2 individuals who said that they were members of that
3 organization?

4 A I recall that there were three members, Jason
5 Lopez, Deirdre Kennedy and Mel Baker.

6 Q Are any of those three persons still associated
7 with KALW?

8 A Jason Lopez has a radio show that is on KALW.

9 Q And Deirdre Kennedy?

10 A No association with KALW?

11 Q Is that the same with Mel Baker?

12 A Same with Mel Baker.

13 ~~Q So, you have -- have you interacted with Mr.~~
14 Lopez?

15 A Extremely limited.

16 Q Was that through the period -- had you interacted
17 with Mr. Lopez prior to the 1997 renewal challenge?

18 A Prior to the renewal challenge it was pretty much
19 limited to, like I had said before, assigning him to as
20 needed announcerships at the radio station. Since 1997,
21 very limited.

22 Q Very limited. Do you have an opinion as to why
23 Mr. Lopez filed or participated in the filing of the GGPR
24 petition?

25 A My opinion is he's a very disgruntled person.

1 Q Was there any particular disgruntlement that
2 you're aware of relating to KALW?

3 A In my opinion, I think he saw that other people
4 were getting advancements and that he felt he was more
5 deserving of than they were.

6 Q Would that advancement include General Manager of
7 the station?

8 A I don't think he held Jeff Ramirez in high regard.

9 Q So, perhaps Mr. Lopez, in your opinion, might have
10 felt that he himself would have been a better General
11 Manager than Jeff Ramirez?

12 A He could have had that opinion, I would not be
13 surprised to find that he held that opinion.

14 Q Do you know of any comments that Mr. Lopez may
15 have made to support that opinion?

16 A Prior to the establishment of Golden Gate Public
17 Radio, no.

18 Q After the establishment?

19 A After the establishment, only in documents I've
20 seen presented by Golden Gate Public Radio.

21 Q Do you have an opinion of Mr. Lopez's honesty?

22 A I don't have any factual incident I can give you
23 where I would say he has been dishonest.

24 Q Do you have a basis to judge his reputation for
25 character?

1 A I don't have that, no.

2 Q You mentioned also Deirdre Kennedy as being one of
3 the members of the GGPR, do you have an opinion as to her
4 motivation, her participating in the renewal challenge?

5 A My opinion is that she was a person, again, who
6 was feeling that she was passed over and not only at KALW
7 but other broadcast facilities, outlets in the Bay Area, and
8 this looked like a way to get even.

9 Q And do you have any comments that she has made
10 that has helped you formulate that opinion?

11 A No, I have no, not outside what GGPR has stated in
12 its complaints. I'm trying to think of motivation for them.

13 ~~Q You did not mention Dave Evans as a member of~~
14 GGPR, perhaps because he had, at a certain point, resigned
15 from the board. Are you aware that he was one of the
16 founders of GGPR?

17 A I never knew that he was an official member of
18 GGPR.

19 Q Were you aware that Dave Evans had filed a
20 declaration that was filed with the GGPR Petition to Deny?

21 A I wasn't aware of that.

22 Q To the extent that Mr. Evans might have a
23 motivation to participate in the challenge of the renewal of
24 the KALW license, do you have an opinion as to what his
25 motivation would be?

1 A My opinion, I believe that he was just upset that
2 somehow he was feeling persecuted by management when
3 management was trying to get him to do his job and he wasn't
4 physically able to do it.

5 Q Do you have a basis for or had he made any
6 comments to you about his treatment by SFUSD?

7 A Not that I can recall specific comments.

8 Q Bill, we've noticed today that you have developed
9 a handicap that makes it difficult for you to read certain
10 documents, and I was wondering if this is a recent
11 development?

12 A This is a recent development within this calendar
13 year.

14 Q Within this calendar year. So, I can understand
15 how it's been hard to adjust to that. So, in 2001, Spring
16 of 2001, when you were inspecting the Public Information
17 File, as you discussed earlier, you did not have the
18 impairment that you're currently --

19 A That's true.

20 Q Is SFUSD assisting you with accommodations?

21 A We're in the process right now of looking at
22 appropriate reasonable accommodation.

23 Q Is that accommodation under the Americans with
24 Disabilities Act?

25 A Correct.

1 Q Do those accommodations include visual aids?

2 A I'm hoping they will, yes.

3 Q Do you have any equipment on your computer that
4 allows you to read documents more easily?

5 A Yes. I have a program on the computer which
6 magnifies text to the point where I can read it. I can read
7 anything given that it's large enough, yes. Or I have good
8 readers, one or the other.

9 MS. REPP: I would like to show you some
10 documents, these are on the disk, do you want me to -- I can
11 enter them into evidence or we can refer to their document
12 numbers?

13 ~~MR. SHOOK: Why don't you refer to the document~~
14. number.

15 MS. REPP: This is for the document request. What
16 I am referring to are documents that were provided to the
17 FCC in response to the first request for documents made to
18 SFUSD, and the documents are numbered KALW 3560 through
19 3565. And fortunately I may have, I believe, 64 and 65 here
20 to look at first. If we can go off the record a minute.

21 (Off the record at 3:02 p.m.)

22 (Back on the record at 3:03 p.m.)

23 MS. REPP: We're back on the record. Would you
24 like a copy?

25 MR. SHOOK: Just put it here and we can both look

1 at it.

2 BY MS. REPP:

3 Q Mr. Helgeson, I am asking you to look at a
4 document that is among the documents at 3560 to 3565 of the
5 production request. This document is a Form 323E that has
6 been completed on behalf of San Francisco Unified School
7 District, stating, in response to Box 1 on page one, that
8 all the information furnished is reported as of January 31,
9 1999. And the second page of the form includes a
10 verification box with the name of licensee/permittee of San
11 Francisco Unified School District, title of the signatory is
12 Executive Director Office of Public Engagement, SFUSD. The
13 signature block appears to be Jackie Wright, and the date
14 handwritten is 3/7/2001.

15 Bill, do you know if this document is currently in
16 the Public Information File of the station?

17 A Yes, I believe it is.

18 Q Did you participate in the creation of this
19 document?

20 A Of this document, yes, I did.

21 Q Do you recollect when it was prepared?

22 A Late February, in February of 01. I don't recall
23 the exact date.

24 Q Do you recall what were the circumstances that
25 caused you to prepare the report at that time?

1 A Upon my 2000 -- in February 2001, reviewing
2 documents that were in the Public File, we believe there
3 should have been a Supplemental Ownership Report for 1999
4 and I did not see one. So, I took it upon myself to create
5 this one.

6 Q Where did you get the information to complete the
7 box on page two, which provided the names of officers,
8 members of governing board?

9 A I very well, I'm not 100 percent certain, I very
10 well, it only was two years prior, this was in 2001 and
11 we're looking at who was here in 1999, so probably just from
12 memory pretty much the same board in 2001 that there was in
13 1999. As a matter of course we also print the names of all
14 the board members in our Program Guide each quarter, so I
15 might have referred to a Program Guide from that period of
16 time. So, a combination of memory at that point plus
17 Program Guide most likely.

18 Q Did you witness the signing of this Ownership
19 Report?

20 A I believe Jackie Wright came to the station and
21 signed it.

22 Q Do you recollect discussing with Jackie Wright at
23 the time what the purpose of the report was?

24 A Yes. And I explained to her that this is a
25 document that I could not find a copy of and it should have

1 been in the Public File, and said we were creating this.

2 Q And that's why the document is dated 3/7/2001,
3 that's when you believe she signed?

4 A Yes, absolutely.

5 Q Jackie Wright --

6 A Jackie Wright didn't start working for the
7 District until 2001, yes.

8 Q Okay. I'd like to next have you review another
9 document which is the Form 323E Ownership Report, it's also
10 within the documents numbered 3560 to 3565, and this is
11 entitled, it's an Ownership Report for San Francisco Unified
12 School District, all information reported, it's furnished as
13 of July 31, 2000.

14 MS. REPP: If we could go off the record.

15 (Off the record at 3:08 p.m.)

16 (Back on the record at 3:08 p.m.)

17 MS. REPP: Back on the record.

18 BY MS. REPP:

19 Q Bill, we are looking at a report dated as of July
20 31, 2000 for San Francisco Unified School District, Form
21 323E. Is it your understanding that a copy of this is on
22 file in the station's Public Information File?

23 A Yes, it is.

24 Q Do you recollect the circumstances of the
25 preparation of this report?

1 A I recognize that in February 2001, upon inspecting
2 the Public File I believe there should have been a new
3 Supplemental Ownership Report filed due to a change in the
4 makeup of the board, and, at that point, and so I created
5 this form and Jackie Wright then, presented it to Jackie
6 Wright to sign.

7 Q So, you were there when Jackie Wright signed this
8 document?

9 A Yes.

10 Q Most of the Supplemental Ownership Reports for the
11 District have been dated as of January of the calendar year
12 to reflect a change in board members, due to elections the
13 prior November. Do you recollect why this report is dated
14 as of July 31, instead of a January date?

15 A Periodically, and I've have to -- I don't recall
16 but, sometimes a board member would change because they
17 would resign and there would have to be -- somebody else
18 would be appointed midterm by the Mayor. And so there would
19 be a change in the makeup of the board, even though it
20 wasn't as a result of an election. And I don't recall who,
21 I'd have to compare this one to the one that would have been
22 the previous period to find out who that one person was.

23 Q When you were preparing the report in March of
24 2001, how would you have known that there was a change in
25 the board membership back in July of 2000?

1 A Given that it was less than a year before by that
2 point, our memory was still pretty good of who was on the
3 board or who had just become recently on the board. And
4 also, again, could refer to a Program Guide, since we list
5 the names of the board members on that Program Guide.

6 Q Besides putting a copy of this Ownership Report in
7 the Public Information File, would you have filed it with
8 the FCC?

9 A We would have filed it with the FCC.

10 Q Would you have personally submitted it?

11 A Perhaps. I don't recall if I did or the General
12 Manager did.

13 Q Would you typically have a transmittal letter?

14 A Not typically. I don't recall other than mailing
15 it, I don't recall the format for mailing it.

16 Q And you would have placed this report for 2000 in
17 the Public Information File in the station on or about March
18 7, 2001?

19 A True.

20 Q A copy thereof?

21 A Copies, yeah.

22 Q Where would you have put the original?

23 A The original would have gone in the envelope to
24 the FCC.

25 Q Likewise, going back to the report we just

1 discussed previously in 1999 that was also executed in Marc
2 of 2000, would you have, in the normal course, submitted a
3 copy of that report to the FCC?

4 A Not a copy, the original.

5 Q The original.

6 MR. SHOOK: Just for clarification sake, you had
7 mentioned March 2000 and I take it you meant March 2001.

8 MS. REPP: I did mean March 2001. Thank you.

9 THE WITNESS: I didn't catch that either.

10 BY MS. REPP:

11 Q I want to turn to one more document, which is also
12 a Form 323E, and the information is furnished, reported as
13 of January 31, 2001, the signature block on page two is San
14 Francisco Unified School District, the title is Executive
15 Director Office of Public Engagement, SFUSD. The signature
16 appears to be that of Jackie Wright. The date is 3/7/2001.
17 And there's a signature block, there's a block in response
18 to members of the governing board that has Arlene Ackerman,
19 Hernandez, Kelley, Mar, Wynns, Cha, Chen, and Sanchez?

20 A Yes.

21 Q Bill, you're looking at a report that's a Form
22 323E for which information is provided as of January 31,
23 2001, which is executed on page two on 3/7/2001. Did you
24 prepare this report?

25 A This report I prepared.

1 Q And what were the circumstances of the preparation
2 of this report?

3 A Upon reviewing the Public File and what I believe
4 the documents should have been in there, I believe this
5 document, I should have been able to find this document but
6 I did not. So, upon not finding it, we did create this
7 document, I did.

8 Q Why did you feel that this document needed to be
9 created?

10 A Because there had been a change on the ownership,
11 there had been a change among the board members, I believe,
12 from the previous one.

13 Q When you say you reviewed the Public Information
14 File, that would have been about February or March of 2001?

15 A Yes.

16 Q Did you personally type up this report?

17 A I believe I personally typed up this report, yes.

18 Q And again, did you determine the information, I
19 guess this would have been very fresh in your mind --

20 A This would have, yes. Effectively, the current
21 board as of the date Jackie Wright signed it, yes.

22 Q And you presented this report to Jackie Wright
23 when she visited KALW on March 7th, 2001?

24 A I don't -- I'm just -- that's an assumption that
25 she visited the station. We very well could have taken the

1 information down to her at her office.

2 Q Did you witness Jackie Wright signing this
3 document?

4 A Yes, I think I remember seeing her sign it.

5 Q And what would you have done with the original?

6 A The original would have been sent to the FCC
7 address in Washington, and a photocopy would have been put
8 in the Public File.

9 Q At the same time it was sent?

10 A Yes.

11 Q One other individual who has also provided
12 information on behalf of GGPR in the form of a declaration
13 is Michael Johnson. Are you aware of his participation in
14 the documentation submitted in the renewal challenge?

15 A I understand there was some, he was not, as I
16 know, a member of GGPR but he signed pieces of paper as part
17 of their challenge.

18 Q Do you have an opinion as to why Mr. Johnson may
19 have participated in the renewal challenge?

20 A Mr. Johnson is a talented man who is very
21 disgruntled. Again, I think he was upset with management of
22 the radio station and felt he could be doing a better job
23 than the management that was in place at the time, and felt
24 he might have been passed, he may unfairly have been passed
25 over for the job, for management jobs.

1 Q Do you have an opinion as to Mr. Johnson's
2 honesty?

3 A He can very well be, I have no reason to, I have
4 no specific incident I can report to you that would question
5 his honesty.

6 Q And do you have an opinion as to his character?

7 A His character I don't have any opinion about.

8 MS. REPP: That is it. Any further questions?

9 MR. SHOOK: Of course.

10 THE WITNESS: Of course.

11 BY MR. SHOOK:

12 Q Ms. Repp asked you, I believe, whether or not you
13 had prepared or created the three Ownership Reports that she
14 presented to you for review. And if I remember correctly,
15 your answer was that yes, you created all three. Is that
16 the case?

17 A Yes.

18 Q Now, I think she also asked you, she may have
19 actually gone into more detail in terms of how the document
20 was physically created and did you prepare this on a
21 computer or did you actually use a typewriter to prepare
22 these three Ownership Reports?

23 A I believe it was typewriter.

24 Q Is that typewriter something that you're the only
25 person who uses a typewriter or are there other people in

1 the office who would use a typewriter as well?

2 A There has been a typewriter sitting in the front
3 office there, at least one or two for general use.

4 Q The desk that you have, doe the desk that you have
5 actually have a typewriter or do you have to get up from
6 your desk to go someplace --

7 A I've got to get up from my desk to go sit at the
8 typewriter.

9 Q Okay. We had talked about 1993 and 1995
10 Supplemental Ownership Reports that had, that were signed
11 off on in 1997, and the last ones that we saw that we, at
12 least at this point, believe to be the ones that were in the
13 Public File and correctly represent the ownership or the
14 board, the school board of SFUSD in 1993 and 1995, those
15 reports were signed off on a December of 1997, I believe I
16 asked you some questions in terms of whether or not you
17 recall physically preparing those reports. Now, Im showing
18 you the 1993 report, it appeared as Attachment 2. Is it
19 your understanding, from looking at this report, that that
20 was physically typed as opposed to generated from a
21 computer?

22 A I would have to say given my eyesight I would say
23 it looks more of a computer generated, doesn't it. What I'm
24 looking at, from the looks of the text, it looks, it appears
25 to be computer generated.

1 MS. REPP: And you are looking at the --

2 THE WITNESS: This typed face here.

3 MS. REPP: If you look up there, it goes past the
4 line.

5 THE WITNESS: Oh, yes, I see this. Where it looks
6 like it's typed. I'm looking at the line that says San
7 Francisco Unified School District and the word District
8 looks like it's gone over the line of the form there,
9 outside the box.

10 MS. REPP: Bill, you might want to look here on
11 line C where the Xs are put in.

12 THE WITNESS: I'm sorry where?

13 MS. REPP: Just here in terms of can you see the
14 markings, Xs?

15 THE WITNESS: Yes.

16 BY MR. SHOOK:

17 Q Having looked at the report, does this help you in
18 terms of your understanding as to whether or not this
19 document that you're looking at, Attachment 2 that was given
20 to us in the Admissions Responses, that's supposed to
21 reflect the 1993 Ownership Report that was in the station's
22 files, was that document typed or was that computer
23 generated?

24 A This would appear to be, this document that I'm
25 holding in front of me, appears to be typed.